



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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SEP 23 2011

Ref: 8EPR-N

Ms. Rhonda O'Byrne, District Ranger  
Northern Hills Ranger District  
Black Hills National Forest  
2014 North Main Street  
Spearfish, SD 57783

RE: EPA Comments on Draft Environmental Impact  
Statement, Steamboat Project, CEQ # 20110255

Dear Ms. Byrne:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act (CAA), 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the August 2011 Draft Environmental Impact Statement (DEIS) for the Steamboat Project. This DEIS was prepared by the Northern Hills Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to analyze potential environmental impacts associated with proposed vegetation and fuels treatments to provide structural diversity in big game winter range and to reduce the risk of mountain pine beetle (MPB) infestations and high severity wildfire.

The Steamboat Project Area is located northwest of Rapid City between the towns of Nemo and Piedmont, South Dakota, and consists of 24,596 acres, including 21,833 acres of USFS lands and 2,713 acres of interspersed private lands. The No Action alternative (Alternative A) and three action alternatives are analyzed in the Steamboat Project DEIS. At this time, the USFS has not identified a preferred alternative. Briefly, the action alternatives include the following:

- Alternative B (Proposed Action) – 12,336 acres of vegetation treatments; 10,608 acres of prescribed burning; and 20 miles of new roads;
- Alternative C (developed in response to concerns with MPB infestation) – 18,049 acres of vegetation treatments; 10,608 acres of prescribed burning; and 41 miles of new roads; and
- Alternative D (developed in response to concerns with new road construction) – 9,394 acres of vegetation treatments; 10,608 acres of prescribed burning; and no new roads.

In a January 12, 2011 letter, EPA provided scoping comments for this project. We appreciate that the USFS addressed many of our comments in the DEIS. As a result, our concerns with the August 2011 DEIS have been narrowed to two main issues: (1) aquatic resources and (2) air quality.

### **1) Aquatic resources impacts should be more fully mitigated and monitored.**

EPA considers protection of aquatic resources to be among the most critical issues to be addressed in any NEPA analysis for vegetation management activities. Most activities contemplated under the proposed action alternatives (e.g., thinning, prescribed fire, road construction) have the potential to adversely impact aquatic resources, including surface and ground waters, wetlands, streams, riparian areas, and their supporting hydrology. Generally, the DEIS provides a thorough characterization of existing aquatic resource conditions and potential impacts from project activities. However, given the potential for aquatic resource impacts, we recommend that USFS expand its analyses in the following areas in order to fully evaluate and mitigate impacts.

Impact of Roads on Aquatic Resources: We support the DEIS design criteria related to new road construction and restoration of stream crossings. As the DEIS notes, these measures should reduce impacts from new roads and should help reduce the number of current Connected Disturbed Areas. To further reduce impacts, EPA recommends utilizing existing roads to the greatest extent possible and limiting the number/density of new roads, as well as locating roads to limit impacts to surface waters.

The Steamboat Project action alternatives propose varying degrees of new road construction (Alternative B - 20 miles, Alternative C - 41 miles, and Alternative D - 0 miles) to facilitate treatment activities. As a result, Alternative D would have the least impact on aquatic resources. The DEIS notes that all roads constructed under Alternatives B and C would be closed following project activities, unless identified for inclusion on the motorized vehicle use map of the Forest-wide travel management plan. Since it would be difficult to ensure complete closure of these roads and long-term environmental impacts may result, EPA recommends developing a monitoring plan and schedule to assess road closure effectiveness.

Impacts to Water Resources from Chemical Applications: The DEIS notes that the action alternatives include activities that require the use of chemicals, pathogens, or pesticides, but Forest Plan standards and Best Management Practices (BMPs) would be employed to reduce the risk to water quality. It would be helpful if these standards and/or BMPs were summarized in Appendix C, Design Criteria and Monitoring. We support measures, such as avoidance of spraying on windy or rainy days, to ensure that application procedures do not contribute to potential adverse health and environmental impacts associated with drift of chemicals to aquatic areas or other sensitive habitats. Also, procedures for the handling of chemicals should be carefully designed since, depending on the chemical, there may not be threshold limits for accidental spills into a waterbody. Finally, to ensure protection of the health of domestic, agricultural, and recreational water users and of the aquatic ecosystem, we recommend developing an aquatic monitoring plan to assess any adverse impacts to water quality resulting from aqueous transport of hazardous substances.

Design Criteria and Monitoring: We support Appendix C's extensive list of project design criteria and monitoring requirements to protect aquatic resources, including special requirements for wetland, streams and springs. To further ensure that project activities do not adversely impact aquatic resources, we recommend expanding the list (in addition to the above-mentioned suggestions) as follows:

- Require monitoring of revegetation efforts for five years to ensure success.



- Specify steps to protect range improvements (i.e., water improvements, spring enclosures, corrals) from mechanical vegetation treatments, prescribed burning application and road construction.
- Provide a monitoring schedule for the breakdown of hydrophobic soils following prescribed burns. We suggest up to five years, as needed.

## **2) Baseline air quality and project impacts should be fully disclosed.**

The project area is near population centers, as well as a mandatory Class I Federal area (Wind Cave National Park). In addition to the National Ambient Air Quality Standards, i.e., health-based standards to protect ambient air quality, the CAA requires special protection of visibility in the nation's large National Parks and Wilderness Areas (identified as mandatory Class I Federal areas).

We appreciate the qualitative air quality discussion included in the Fire and Fuels section of the DEIS. EPA recommends expanding this discussion to provide a thorough characterization of existing air quality conditions in the area. To that end, it would be beneficial if the FEIS included the following:

- Identification of air pollutant sensitive receptors (such as population centers and Class I and Sensitive Class II areas in the vicinity).
- Trending of air quality at the nearby Class I Federal area over the past several years. Such data are readily available from the VIEWS site for air quality related values (<http://views.cira.colostate.edu/web/>). Information regarding current conditions will be an important tool for monitoring the impacts of the various project activities.

Prescribed Fire: The Steamboat Project action alternatives include the application of prescribed burning to 10,608 acres over 10 years. This significant prescribed fire activity may cause degradation of air quality in the region. It would be helpful if Appendix A included a map of proposed prescribed fire treatment areas similar to the information provided on the vegetation treatment maps. In addition, while we realize the individual burn plans prepared for this project would quantify expected emissions, it would be helpful if the FEIS included an estimate of predicted emissions (or at least a qualitative discussion of the types of pollutants expected to be generated).

We support the prescribed fire design criteria and monitoring recommendations outlined in Appendix C. We recommend elaborating on these requirements in the FEIS to include a discussion regarding: (1) how the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008) would be implemented through the site-specific burn plans designed for each prescribed burn conducted under this project; and (2) how the public will be notified of pending burns.

## **EPA's Rating and Recommendation**

Consistent with Section 309 of the CAA, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Since a preferred alternative was not identified in the DEIS, we are rating the DEIS based on the action alternatives (we do not rate the no

action alternative). Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, EPA is rating this DEIS as Environmental Concerns – Adequate Information (EC-1). The “EC” rating indicates that EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The “1” rating indicates that EPA believes the DEIS provides adequate information and analyses to disclose project impacts. A full description of EPA’s rating system is enclosed.

We hope that our comments regarding aquatic resources and air quality will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this DEIS. If we may provide further explanation of our comments, please contact me at 303-312-6925, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. J. Bohan', with a long horizontal flourish extending to the right.

Suzanne J. Bohan  
Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

Enclosure

## U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

### Definitions and Follow-Up Action\*

#### Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

#### Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 109 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment February 1987